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November 30, 2005

By Electronic Filing

Marlene H. Dortch
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

**Re: Television Station Section 339(a)(2)(D)(viii) Waiver Request
WQHS-TV, Cleveland, OH (FIN: 60556)
MB DOCKET NO. 05-317**

Dear Ms. Dortch:

On behalf of Univision Cleveland LLC, the licensee of Station WQHS-DT, Cleveland, Ohio ("WQHS"), and pursuant to Section 339 (a)(2)(D) of the Communications Act of 1934 (the "Act"), as amended by the Satellite Home Viewer Extension and Reauthorization Act of 2004 ("SHVERA"),¹ the purpose of this correspondence is to request a six-month waiver of digital testing to prohibit satellite subscribers from obtaining digital signal strength tests of WQHS-DT's signal. Good cause exists for the instant waiver request because it meets the waiver criteria under Section 339(a)(2)(D)(viii)(IV) (use of a side-mounted antenna).

In its Form 381 filing, WQHS-DT certified that it would construct the facilities specified in its license application FCC File No. BLCDDT-20031030AGJ. Because the station's NTSC antenna occupies the top-mount position on the station's tower, the station was precluded from top-mounting its DTV antenna. Therefore, its current DTV facilities are required to utilize a side-mounted, directionalized antenna and as a result, the station's DTV coverage is not comparable to its analog coverage. WQHS anticipates seeking authority and constructing the top-mounted facilities once the analog antenna is no longer in use.

Accordingly, the reduction in coverage area due to the use of a side mounted antenna warrants a six-month waiver of digital testing to prohibit satellite subscribers

¹ See 47 U.S.C. § 339(a)(2)(D) as amended by Section 204 of SHVERA.

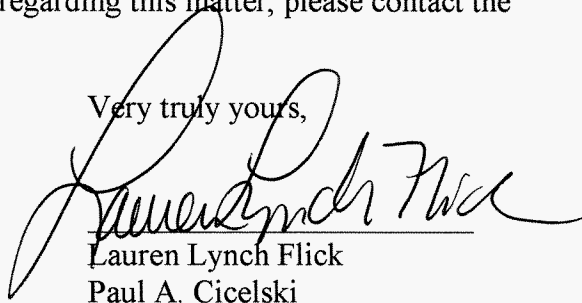
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from conducting or seeking a digital signal strength test and receiving a distant digital signal from the same network under Section 339 of the Act. As a result, Univision Cleveland LLC respectfully requests that the Commission grant the requested waiver.

Should there be any questions regarding this matter, please contact the undersigned.

Very truly yours,

A handwritten signature in black ink, appearing to read "Lauren Lynch Flick", is written over a horizontal line. The signature is fluid and cursive.

Lauren Lynch Flick
Paul A. Cicelski

Counsel for Univision Cleveland LLC

cc: Nazifa Sawez (by hand delivery)

532300-0001113